

# EXHIBIT A

## Reis, John

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**From:** Michael Geraciotti <MGeraciotti@levineorr.com>  
**Sent:** Tuesday, January 28, 2014 11:33 AM  
**To:** Reis, John  
**Subject:** RE: Mason case

John, I was holed up in trial prep for a case set to start yesterday. The case was dropped at the last minute. Your discovery and discovery in a 2nd case are at the top of the list.

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**From:** Reis, John [JReis@cozen.com]  
**Sent:** Tuesday, January 28, 2014 10:24 AM  
**To:** Michael Geraciotti  
**Cc:** James Freeman (JFreeman@jafreemanlaw.com)  
**Subject:** Mason case

Mike, I am following up on our discovery requests sent Dec. 19, 2013, per the attached. I do not recall you asking for an extension before the due date elapsed. Can you advise on the status of the responses?

[cid:image001.gif@01CF1C1B.5C6D5EC0]

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## Reis, John

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**From:** Michael Geraciotti <MGeraciotti@levineorr.com>  
**Sent:** Friday, March 07, 2014 10:58 AM  
**To:** Reis, John  
**Subject:** RE: bankers standard v. interline et al

I know. I carry the discovery home with me everyday. It is now the top priority.

Because I am dealing with multiple corporations, one of which is Chinese (and whose CEO is unavailable due to traveling back and forth) gathering info is more difficult than usual. Not to mention, the unavailability during the 10 day or so celebration of the Chinese New Year.

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**From:** Reis, John [JReis@cozen.com]  
**Sent:** Friday, March 07, 2014 9:34 AM  
**To:** Michael Geraciotti  
**Subject:** RE: bankers standard v. interline et al

I am glad you emailed me because I have been wondering when I would be getting your answers and responses to our interrogatories and requests for production of documents. It's very overdue.

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-----Original Message-----

**From:** Michael Geraciotti [<mailto:MGeraciotti@levineorr.com>]  
**Sent:** Friday, March 07, 2014 10:25 AM  
**To:** Reis, John  
**Subject:** bankers standard v. interline et al

John: I have a standard copy of the interline insurance policy. When I return to the office (from vacation) I will mail a copy. I am waiting on the certification.

It is my recollection that I have already provided a copy of MTD's CEO's letter stating there was no insurance in place. If you need that letter notarized or certified, let me know.

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